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Attorneys for Defendants  
SAN FRANCISCO COMMUNITY INVESTMENT FUND,  
CITY AND COUNTY OF SAN FRANCISCO, and NAOMI KELLY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, *ex rel.*  
LEIASA BECKHAM, and STATE OF  
CALIFORNIA, *ex rel.* LEIASA BECKHAM,

Plaintiffs,

vs.

1850 BRYANT LAND LLC, KASLOFSKY  
& ASSOCIATES LLC, THURSTON  
KASLOFSKY, CHRISTOPHER PAUL  
FOLEY, DOUGLAS ROSS, SAN  
FRANCISCO COMMUNITY  
INVESTMENT FUND, CITY AND  
COUNTY OF SAN FRANCISCO, and  
NAOMI KELLY,

Defendants.

Case No. 3:21-cv-05742-RS (DMR) (AGT)

**DECLARATION OF KARUN TILAK IN  
SUPPORT OF DEFENDANTS' RESPONSE TO  
WILLIAM K. HANAGAMI AND BYRON T.  
BALL'S MOTION TO CONDITIONALLY  
WITHDRAW AS COUNSEL FOR PLAINTIFF  
AND RELATOR LEIASA BECKHAM**

Hearing Date: November 14, 2024  
Time: 1:30 p.m.  
Before: Honorable Richard Seeborg  
Place: 450 Golden Gate Avenue  
Courtroom 3 – 17th Floor  
San Francisco, CA 94102

Trial Date: September 8, 2025

1 I, Karun Tilak, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California, am admitted to  
3 practice before this Court, and am a Deputy City Attorney in the Office of the City Attorney of San  
4 Francisco. I am counsel of record for Defendants San Francisco Community Investment Fund, City  
5 and County of San Francisco, and Naomi Kelly (“San Francisco Defendants”).

6 2. I make this declaration in support of Defendants’ response to William K. Hanagami and  
7 Byron T. Ball’s Motion to Conditionally Withdraw as Counsel for Plaintiff and Relator Leiasa  
8 Beckham.

9 3. San Francisco Defendants served written discovery, including requests for production,  
10 on Relator on April 1, 2024. Despite multiple extensions, Relator’s production continues to be  
11 substantially noncompliant with the Federal Rules of Civil Procedure and the parties’ stipulated ESI  
12 order. As such, San Francisco Defendants sent Mr. Hanagami a letter on August 23, 2024 outlining  
13 the various deficiencies in Relator’s production and proposing a schedule for Relator to re-produce her  
14 production in a useable manner.

15 4. On August 19, 2024, the parties appeared for a settlement conference before Chief  
16 Magistrate Judge Ryu. After the settlement conference, Magistrate Judge Ryu ordered Relator to  
17 serve a supplemental settlement brief on September 13, 2024 containing certain specific information  
18 and citations. *See* ECF No. 110.

19 5. On September 12, 2024, Mr. Hanagami called me and informed me that he would be  
20 seeking a three-week extension of the deadline to serve the supplemental settlement brief. Mr.  
21 Hanagami also requested an extension to respond to San Francisco Defendants’ August 23 letter. Mr.  
22 Hanagami explained that the basis for the request was to allow Relator to obtain replacement counsel  
23 and that both he and Mr. Ball intended to withdraw as counsel for Relator. Magistrate Judge Ryu  
24 subsequently granted Relator an extension to October 4 to serve the supplemental settlement brief.  
25 *See* ECF No. 112.

6. On September 20, 2024, Mr. Hanagami emailed counsel requesting a further extension of approximately 30 days to November 5, 2024 for Relator to provide the updated settlement brief. He also clarified that he was seeking a similar extension to respond to the August 23 letter.

7. To date, Defendants have not been able to address the issues identified in the August 23 letter with Relator's counsel, and Defendants' ability to move forward with discovery from Relator has stalled.

8. I am informed that the San Francisco Community Investment Fund (“SFCIF”) has held in reserve approximately \$2.5 million because of this litigation, and that these funds would otherwise be available to fund community development projects consistent with SFCIF’s operational purpose.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18th day of October, 2024 at San Francisco, California.

*s/Karun Tilak*  
KARUN TILAK